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UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
v.) CRIMINAL NO. 04-10153-RWZ
MANUEL NOVOA BAIRRES)

JOINT MEMORANDUM PURSUANT TO LOCAL RULE 116.5(A)

The United States of America and defendant Manuel Novoa Baires hereby submit this joint memorandum addressing the issues set forth in Local Rule 116.5(A) (1) through (A) (7).

(A) (1)

Defendant seeks an additional two weeks to submit a discovery letter.

(A) (2)

The defendant does not request discovery concerning expert witnesses under Fed. R. Crim. P. 16(a)(1)(E).

.....(A) (3)

The parties at this time are uncertain whether additional discovery will be needed as a result of future receipt of information, documents, or reports of examinations or tests.

(A) (4)

Defendant seeks a period of 45 days to file pretrial motions. The parties submit that a motion date should be set after the government has had an appropriate time to respond.

(A) (5)

A period of excludable delay should be ordered under the Speedy Trial Act from the date of the conference through the date of the filing of defendant's motions.

(A) (6)

Defendant expects the case to be tried.

(A) (7)

The parties defer to the Court regarding the setting of a final status conference and/or any interim status conference.

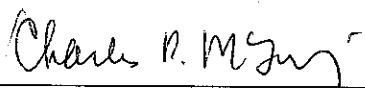
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By:



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By his attorney,



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